

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA *ex rel.* PETER D.
GRUBEA,

Plaintiffs,

v.

ROSICKI, ROSICKI & ASSOCIATES, P.C.,
PARAMOUNT LAND, INC., THRESHOLD LAND
INC., ENTERPRISE PROCESS SERVICE, INC.,
MCCABE, WEISBERG, & CONWAY, P.C.,
ATTORNEY OUTSOURCING SUPPORT SERVICES,
INC., REO AMERICA ABRSTRACT, INC.,

Defendants.

DOCKET NO.: 12-CV-7199 (JSR)

**ANSWER TO FOURTH
AMENDED COMPLAINT**

Defendants ROSICKI, ROSICKI & ASSOCIATES, P.C. (“RRA”), PARAMOUNT LAND, INC. (“Paramount”), THRESHOLD LAND INC. (“Threshold”), ENTERPRISE PROCESS SERVICE, INC. (“Enterprise”) (collectively, the “Rosicki Defendants”), through their attorneys, McLAUGHLIN & STERN, LLP, as and for an Answer to the Fourth Amended Complaint (“Complaint”) of Plaintiff-Relator PETER D. GRUBEA (“Relator” or “Grubea”), states as follows:

1. Deny the allegations in Paragraph 1 of the Complaint.
2. Neither admit nor deny the allegations contained in Paragraph 2 of the Complaint, in that the allegations do not call for a response.
3. Neither admit nor deny the allegations contained in Paragraph 3 of the Complaint, in that the allegations do not call for a response. To the extent the allegations call for a response, Rosicki Defendants deny the allegations in Paragraph 3 of the Complaint.

4. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 4 of the Complaint.

5. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 5 of the Complaint, except admit that FHA, through its Government-backed insurance programs, insures approved lenders against losses on mortgage loans, including losses incurred in foreclosure proceedings.

6. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 6 of the Complaint.

7. Paragraph 7 contains legal conclusions which do not require a response. Furthermore, to the extent the allegations in the paragraph purport to quote documents, that document is the best record of its contents, and Relator's characterization of it is denied.

8. Paragraph 8 contains legal conclusions which do not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 8.

9. Paragraph 9 contains legal conclusions which do not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 9.

10. Deny the allegations in Paragraph 10 of the Complaint.

11. Paragraph 11 contains legal conclusions which do not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 11.

12. Paragraph 12 contains legal conclusions which do not require a response. To the extent a response is required, Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations as to the Bank Defendants in Paragraph 12.

13. Paragraph 13 contains legal conclusions which do not require a response.

JURISDICTION AND VENUE

14. The allegations in Paragraph 14 of the Complaint contain legal conclusions to which no response is required.

15. The allegations in Paragraph 15 of the Complaint contain legal conclusions to which no response is required.

16. The allegations in Paragraph 16 of the Complaint contain legal conclusions to which no response is required. However, to the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 16 of the Complaint.

PARTIES

17. Admit the allegations in Paragraph 17 of the Complaint.

18. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 18 of the Complaint.

19. Admit the allegations in the first sentence in Paragraph 19. To the extent Paragraph 19 purports to quote a web site which, being in writing, speaks for itself, that web site is the best record of its contents.

20. Admit the allegations in Paragraph 20 of the Complaint.

21. Admit the allegations in Paragraph 21 of the Complaint.

22. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 22 of the Complaint.

23. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 23 of the Complaint.

24. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 24 of the Complaint.

25. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 25 of the Complaint.

26. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 26 of the Complaint.

27. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 27 of the Complaint.

28. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 28 of the Complaint.

29. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 29 of the Complaint.

30. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 30 of the Complaint.

31. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 31 of the Complaint.

32. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 32 of the Complaint.

33. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 33 of the Complaint.

34. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 34 of the Complaint.

35. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 35 of the Complaint.

36. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 36 of the Complaint.

37. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 37 of the Complaint.

38. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 38 of the Complaint.

39. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 39 of the Complaint.

FACTS

40. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 40 of the Complaint.

41. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 41 of the Complaint.

42. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 42 of the Complaint.

43. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 43 of the Complaint.

44. Lack knowledge or sufficient information to admit or deny the remaining allegations in Paragraph 44 of the Complaint.

45. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 45 of the Complaint.

46. Paragraph 46 states a legal conclusion which does not require a response.

47. Paragraph 47 states a legal conclusion which does not require a response. Furthermore, Paragraph 47 purports to characterize and describe a statute, regulation and/or government publication. That statute, regulation and/or government publication, being in writing, is the best record of its contents.

48. Paragraph 48 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 48. Furthermore, Paragraph 48 purports to characterize and describe a document. That document, being in writing, is the best record of its contents.

49. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 49 of the Complaint.

50. Paragraph 50 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 50. Furthermore, Paragraph 50 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents.

51. Paragraph 51 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 51.

52. Paragraph 52 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations in Paragraph 52 of the Complaint.

53. Paragraph 53 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 53. Furthermore, Paragraph 53 purports to describe a statement by Treasury Secretary Steven T.

Mnuchin, but Relator does not identify the source of the quote. Rosicki Defendants lack knowledge or sufficient information to either admit or deny the contents of the statement.

54. Paragraph 54 states a legal conclusion which does not require a response. To the extent any further response is required, Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations in Paragraph 54 of the Complaint.

55. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 55 of the Complaint.

56. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 56 of the Complaint.

57. Paragraph 57 states a legal conclusion which does not require a response. Furthermore, Paragraph 57 purports to describe a statement by the Justice Department but does not describe the source. Rosicki Defendants lack knowledge or sufficient information to either admit or deny the contents of the statement. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 57.

58. Paragraph 58 states a legal conclusion which does not require a response. Furthermore, Paragraph 58 purports to quote a document or describe a statement by the Justice of Department. Rosicki Defendants lack knowledge or sufficient information to either admit or deny the contents of the statement. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 58.

59. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 59 of the Complaint.

60. Paragraph 60 states a legal conclusion which does not require a response. Furthermore, Paragraph 60 purports to characterize and describe a document. That document,

being in writing, is the best record of its contents. To the extent a response is required, Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations in Paragraph 60 of the Complaint.

61. Paragraph 61 states a legal conclusion which does not require a response. Furthermore, Paragraph 61 purports to characterize and describe a document. That document, being in writing, is the best record of its contents. To the extent a response is required, Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations in Paragraph 61 of the Complaint.

62. Paragraph 62 states a legal conclusion which does not require a response. Furthermore, Paragraph 62 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

63. Paragraph 63 states a legal conclusion which does not require a response. Furthermore, Paragraph 63 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

64. Paragraph 64 states a legal conclusion which does not require a response. Furthermore, Paragraph 64 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

65. Paragraph 65 states a legal conclusion which does not require a response. Furthermore, Paragraph 65 purports to characterize, describe and quote a document. That

document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

66. Paragraph 66 states a legal conclusion which does not require a response. Furthermore, Paragraph 66 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

67. Paragraph 67 states a legal conclusion which does not require a response. Furthermore, Paragraph 67 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

68. Paragraph 68 states a legal conclusion which does not require a response. Furthermore, Paragraph 68 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

69. Paragraph 69 states a legal conclusion which does not require a response. Furthermore, Paragraph 69 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

70. Paragraph 70 states a legal conclusion which does not require a response. Furthermore, Paragraph 70 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

71. Paragraph 71 states a legal conclusion which does not require a response. Furthermore, Paragraph 71 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

72. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 72 of the Complaint.

73. Paragraph 73 states a legal conclusion which does not require a response.

74. Paragraph 74 states a legal conclusion which does not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 74. Furthermore, Paragraph 74 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

75. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 75 of the Complaint.

76. Paragraph 76 states a legal conclusion which does not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 76. Furthermore, Paragraph 76 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

77. Paragraph 77 states a legal conclusion which does not require a response. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 77.

78. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 78 of the Complaint.

79. Paragraph 79 states a legal conclusion which does not require a response. Furthermore, Paragraph 79 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

80. Paragraph 80 states a legal conclusion which does not require a response. Furthermore, Paragraph 80 purports to describe a statement by Treasury Secretary Steven T. Mnuchin, but Relator does not identify the source of the quote. Rosicki Defendants lack knowledge or sufficient information to either admit or deny the contents of the statement.

81. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 81 of the Complaint.

82. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 82 of the Complaint.

83. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 83 of the Complaint.

84. Paragraph 84 states a legal conclusion which does not require a response. Furthermore, Paragraph 84 purports to quote a document or describe a statement by the Justice of Department. Rosicki Defendants lack knowledge or sufficient information to either admit or deny the contents of the statement. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 84.

85. Paragraph 85 states a legal conclusion which does not require a response. Furthermore, Paragraph 85 purports to quote a document or describe a statement by the Justice of Department. Rosicki Defendants lack knowledge or sufficient information to either admit or deny

the contents of the statement. To the extent any further response is required, Rosicki Defendants deny the allegations in Paragraph 85.

86. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 86 of the Complaint.

87. Paragraph 87 states a legal conclusion which does not require a response. Furthermore, Paragraph 87 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

88. Paragraph 88 states a legal conclusion which does not require a response. Furthermore, Paragraph 88 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

89. Paragraph 89 states a legal conclusion which does not require a response. Furthermore, Paragraph 89 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

90. Paragraph 90 states a legal conclusion which does not require a response. Furthermore, Paragraph 90 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

91. Paragraph 91 states a legal conclusion which does not require a response. Furthermore, Paragraph 91 purports to characterize, describe and quote a document. That

document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

92. Paragraph 92 states a legal conclusion which does not require a response. Furthermore, Paragraph 92 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

93. Paragraph 93 states a legal conclusion which does not require a response. Furthermore, Paragraph 93 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

94. Paragraph 94 states a legal conclusion which does not require a response. Furthermore, Paragraph 94 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

95. Admit that FHA insures approved lenders against losses on mortgage loans, including losses in foreclosure proceedings, and deny knowledge or sufficient information to admit or deny the remaining allegations in Paragraph 95.

96. Paragraph 96 states a legal conclusion which does not require a response.

97. Paragraph 97 states a legal conclusion which does not require a response. Furthermore, Paragraph 97 purports to characterize, describe and quote a statute, regulation and/or government publication, that document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

98. Paragraph 98 states a legal conclusion which does not require a response. Furthermore, Paragraph 98 purports to characterize, describe and quote a statute, regulation and/or government publication, that document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

99. Paragraph 99 states a legal conclusion which does not require a response. Furthermore, Paragraph 99 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

100. Paragraph 100 states a legal conclusion which does not require a response. Furthermore, Paragraph 100 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

101. Paragraph 101 states a legal conclusion which does not require a response. Furthermore, Paragraph 101 purports to characterize, describe and quote a statute, regulation and/or government publication, that document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

102. Paragraph 102 states a legal conclusion which does not require a response. Furthermore, Paragraph 102 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

103. Paragraph 103 states a legal conclusion which does not require a response. Furthermore, Paragraph 103 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

104. Paragraph 104 states a legal conclusion which does not require a response. Furthermore, Paragraph 104 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

105. Paragraph 105 states a legal conclusion which does not require a response. Furthermore, Paragraph 105 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

106. Paragraph 106 states a legal conclusion which does not require a response. Furthermore, Paragraph 106 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

107. Paragraph 107 states a legal conclusion which does not require a response.

108. Paragraph 108 states a legal conclusion which does not require a response. Furthermore, Paragraph 108 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

109. Paragraph 109 states a legal conclusion which does not require a response. Furthermore, Paragraph 109 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

110. Paragraph 110 states a legal conclusion which does not require a response. Furthermore, Paragraph 110 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

111. Paragraph 111 states a legal conclusion which does not require a response. Furthermore, Paragraph 111 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

112. Paragraph 112 states a legal conclusion which does not require a response. Furthermore, Paragraph 112 purports to characterize, describe and quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

113. Rosicki Defendants deny the allegations contained in Paragraph 113 of the Complaint, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 113 of the Complaint as they relate to or concern the other defendants.

114. Rosicki Defendants deny the allegations contained in Paragraph 114 of the Complaint, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 114 of the Complaint as they relate to or concern the other defendants.

115. Rosicki Defendants deny the allegations contained in Paragraph 115 of the Complaint, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 115 of the Complaint as they relate to or concern the other defendants.

116. Rosicki Defendants deny the allegations contained in Paragraph 116 of the Complaint, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 116 of the Complaint as they relate to or concern the other defendants.

117. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 117 of the Complaint.

118. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 118 of the Complaint, except deny the allegations that the Rosicki Defendants had billed the Bank Defendants for unnecessary and unreasonably foreclosure expenses.

119. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 119 of the Complaint.

120. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 120 of the Complaint.

121. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 120 of the Complaint.

122. Admit the allegations contained in Paragraph 122 of the Complaint, except deny that the Rosicki Firm contracts with Paramount for service work and that the Rosicki Firm contracts with Enterprise for title work.

123. Rosicki Defendants deny the allegations in Paragraph 123 of the Complaint.

124. Rosicki Defendants deny the allegations in Paragraph 124 of the Complaint.

125. Rosicki Defendants deny the allegations in Paragraph 125 of the Complaint.

126. Rosicki Defendants deny the allegations in Paragraph 126 of the Complaint.

127. Rosicki Defendants deny the allegations in Paragraph 127 of the Complaint.

128. Rosicki Defendants deny the allegations in Paragraph 128 of the Complaint.

129. Rosicki Defendants deny the allegations in Paragraph 129 of the Complaint.

130. Rosicki Defendants deny the allegations in Paragraph 130 of the Complaint.

131. Rosicki Defendants deny the allegations in Paragraph 131 of the Complaint.

132. Rosicki Defendants deny the allegations in Paragraph 132 of the Complaint.

133. Rosicki Defendants deny the allegations in Paragraph 133 of the Complaint.

134. Rosicki Defendants deny the allegations in Paragraph 134 of the Complaint.

135. Rosicki Defendants deny the allegations in Paragraph 135 of the Complaint.

136. Rosicki Defendants deny the allegations in Paragraph 136 of the Complaint.

137. Rosicki Defendants deny the allegations in Paragraph 137 of the Complaint.

138. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 138 of the Complaint.

139. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 139 of the Complaint.

140. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 140 of the Complaint.

141. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 141 of the Complaint.

142. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 142 of the Complaint.

143. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 143 of the Complaint.

144. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 144 of the Complaint.

145. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 145 of the Complaint.

146. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 146 of the Complaint.

147. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 147 of the Complaint.

148. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 148 of the Complaint.

149. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 149 of the Complaint.

150. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 150 of the Complaint.

151. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 151 of the Complaint.

152. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 152 of the Complaint.

153. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 153 of the Complaint.

154. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 154 of the Complaint.

155. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 155 of the Complaint.

156. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 156 of the Complaint.

157. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 157 of the Complaint.

158. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 158 of the Complaint.

159. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 159 of the Complaint.

160. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 160 of the Complaint.

161. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 161 of the Complaint.

162. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 162 of the Complaint.

163. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 163 of the Complaint.

164. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 164 of the Complaint.

165. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 165 of the Complaint.

166. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 166 of the Complaint.

167. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 167 of the Complaint.

168. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 168 of the Complaint.

169. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 169 of the Complaint.

170. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 170 of the Complaint.

171. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 171 of the Complaint.

172. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 172 of the Complaint.

173. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 173 of the Complaint.

174. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 174 of the Complaint.

175. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 175 of the Complaint.

176. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 176 of the Complaint.

177. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 177 of the Complaint.

178. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 178 of the Complaint.

179. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 179 of the Complaint.

180. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 180 of the Complaint.

181. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 181 of the Complaint.

182. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 182 of the Complaint.

183. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 183 of the Complaint.

184. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 184 of the Complaint.

185. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 185 of the Complaint.

186. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 186 of the Complaint.

187. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 187 of the Complaint.

188. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 188 of the Complaint.

189. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 189 of the Complaint.

190. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 190 of the Complaint.

191. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 191 of the Complaint.

192. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 192 of the Complaint.

193. Rosicki Defendants deny the allegations in Paragraph 193 of the Complaint as it relates to or concerns them, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 193 of the Complaint as it relates to or concerns others.

194. Rosicki Defendants deny the allegations in Paragraph 194 of the Complaint as it relates to or concerns them, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 194 of the Complaint as it relates to or concerns others.

195. Rosicki Defendants deny the allegations in Paragraph 195 of the Complaint as it relates to or concerns them, except lack knowledge or sufficient information to admit or deny the allegations in Paragraph 195 of the Complaint as it relates to or concerns others.

196. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 196 of the Complaint.

197. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 197 of the Complaint.

198. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 198 of the Complaint.

199. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 199 of the Complaint, except deny that the foreclosure fees submitted by the Rosicki Defendants were neither reasonable nor customary, or that they did not reflect market rates.

200. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 200 of the Complaint.

201. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 201 of the Complaint.

202. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 202 of the Complaint.

203. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 203 of the Complaint, except deny the allegations in Paragraph 203 as they relate to or concern the Rosicki Defendants.

204. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 204 of the Complaint.

205. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 205 of the Complaint, except deny the allegations in Paragraph 205 as they relate to or concern the Rosicki Defendants.

206. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 206 of the Complaint.

207. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 207 of the Complaint.

208. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 208 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

209. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 209 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

210. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 210 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

211. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 211 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

212. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 212 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

213. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 213 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

214. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 214 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

215. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 215 of the Complaint.

216. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 216 of the Complaint.

217. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 217 of the Complaint.

218. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 218 of the Complaint.

219. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 219 of the Complaint.

220. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 220 of the Complaint.

221. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 221 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

222. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 222 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

223. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 223 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

224. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 224 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

225. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 225 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that

the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

226. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 226 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

227. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 227 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

228. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 228 of the Complaint.

229. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 229 of the Complaint.

230. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 230 of the Complaint.

231. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 231 of the Complaint.

232. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 232 of the Complaint.

233. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 233 of the Complaint.

234. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 234 of the Complaint.

235. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 235 of the Complaint.

236. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 236 of the Complaint.

237. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 237 of the Complaint.

238. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 238 of the Complaint.

239. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 239 of the Complaint.

240. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 240 of the Complaint.

241. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 241 of the Complaint.

242. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 242 of the Complaint.

243. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 243 of the Complaint.

244. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 244 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

245. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 245 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

246. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 246 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

247. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 247 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

248. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 248 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

249. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 249 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

250. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 250 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

251. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 251 of the Complaint.

252. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 252 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

253. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 253 of the Complaint.

254. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 254 of the Complaint.

255. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 255 of the Complaint.

256. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 256 of the Complaint.

257. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 257 of the Complaint.

258. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 258 of the Complaint.

259. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 259 of the Complaint.

260. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 260 of the Complaint.

261. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 261 of the Complaint.

262. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 262 of the Complaint.

263. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 263 of the Complaint.

264. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 264 of the Complaint.

265. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 265 of the Complaint.

266. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 266 of the Complaint.

267. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 267 of the Complaint.

268. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 268 of the Complaint.

269. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 269 of the Complaint.

270. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 270 of the Complaint.

271. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 271 of the Complaint.

272. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 272 of the Complaint.

273. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 273 of the Complaint.

274. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 274 of the Complaint.

275. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 275 of the Complaint.

276. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 276 of the Complaint.

277. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 277 of the Complaint.

278. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 278 of the Complaint.

279. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 279 of the Complaint.

280. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 280 of the Complaint.

281. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 281 of the Complaint.

282. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 282 of the Complaint.

283. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 283 of the Complaint.

284. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 284 of the Complaint.

285. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 285 of the Complaint.

286. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 286 of the Complaint.

287. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 287 of the Complaint.

288. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 288 of the Complaint.

289. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 289 of the Complaint.

290. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 290 of the Complaint.

291. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 291 of the Complaint.

292. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 292 of the Complaint.

293. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 293 of the Complaint.

294. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 294 of the Complaint.

295. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 295 of the Complaint.

296. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 296 of the Complaint.

297. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 297 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

298. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 298 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

299. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 299 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

300. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 300 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

301. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 301 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

302. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 302 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

303. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 303 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

304. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 304 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

305. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 305 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

306. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 306 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

307. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 307 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

308. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 308 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

309. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 309 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

310. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 310 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

311. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 311 of the Complaint.

312. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 312 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

313. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 313 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

314. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 314 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

315. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 315 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

316. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 316 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

317. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 317 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

318. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 318 of the Complaint.

319. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 319 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

320. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 320 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

321. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 321 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

322. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 322 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

323. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 323 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

324. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 324 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

325. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 325 of the Complaint.

326. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 326 of the Complaint, insofar as Relator has not provided any specific identifying

information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

327. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 327 of the Complaint.

328. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 328 of the Complaint.

329. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 329 of the Complaint.

330. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 330 of the Complaint.

331. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 331 of the Complaint.

332. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 332 of the Complaint.

333. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 333 of the Complaint.

334. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 334 of the Complaint.

335. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 335 of the Complaint.

336. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 336 of the Complaint.

337. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 337 of the Complaint.

338. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 338 of the Complaint.

339. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 339 of the Complaint.

340. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 340 of the Complaint.

341. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 341 of the Complaint.

342. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 342 of the Complaint.

343. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 343 of the Complaint.

344. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 344 of the Complaint.

345. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 345 of the Complaint.

346. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 346 of the Complaint.

347. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 347 of the Complaint.

348. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 348 of the Complaint.

349. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 349 of the Complaint.

350. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 350 of the Complaint.

351. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 351 of the Complaint.

352. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 352 of the Complaint.

353. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 353 of the Complaint.

354. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 354 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

355. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 355 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

356. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 356 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

357. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 357 of the Complaint, insofar as Relator has not provided any specific identifying

information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

358. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 358 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

359. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 359 of the Complaint.

360. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 360 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

361. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 361 of the Complaint.

362. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 362 of the Complaint.

363. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 363 of the Complaint.

364. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 364 of the Complaint.

365. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 365 of the Complaint.

366. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 366 of the Complaint.

367. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 367 of the Complaint.

368. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 368 of the Complaint.

369. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 369 of the Complaint.

370. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 370 of the Complaint.

371. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 371 of the Complaint.

372. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 372 of the Complaint.

373. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 373 of the Complaint.

374. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 374 of the Complaint.

375. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 375 of the Complaint.

376. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 376 of the Complaint.

377. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 377 of the Complaint.

378. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 378 of the Complaint.

379. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 379 of the Complaint.

380. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 380 of the Complaint.

381. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 381 of the Complaint.

382. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 382 of the Complaint.

383. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 383 of the Complaint.

384. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 384 of the Complaint.

385. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 385 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

386. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 386 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

387. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 387 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

388. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 388 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

389. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 389 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

390. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 390 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

391. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 391 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

392. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 392 of the Complaint.

393. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 393 of the Complaint, insofar as Relator has not provided any specific identifying

information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

394. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 394 of the Complaint.

395. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 395 of the Complaint.

396. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 396 of the Complaint.

397. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 397 of the Complaint.

398. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 398 of the Complaint.

399. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 399 of the Complaint.

400. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 400 of the Complaint.

401. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 401 of the Complaint.

402. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 402 of the Complaint.

403. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 403 of the Complaint.

404. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 404 of the Complaint.

405. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 405 of the Complaint.

406. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 406 of the Complaint.

407. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 407 of the Complaint.

408. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 408 of the Complaint.

409. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 409 of the Complaint.

410. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 410 of the Complaint.

411. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 411 of the Complaint.

412. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 412 of the Complaint.

413. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 413 of the Complaint.

414. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 414 of the Complaint.

415. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 415 of the Complaint.

416. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 416 of the Complaint.

417. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 417 of the Complaint.

418. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 418 of the Complaint.

419. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 419 of the Complaint.

420. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 420 of the Complaint.

421. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 421 of the Complaint.

422. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 422 of the Complaint.

423. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 423 of the Complaint.

424. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 424 of the Complaint.

425. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 425 of the Complaint.

426. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 426 of the Complaint.

427. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 427 of the Complaint.

428. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 428 of the Complaint.

429. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 429 of the Complaint.

430. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 430 of the Complaint.

431. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 431 of the Complaint.

432. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 432 of the Complaint.

433. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 433 of the Complaint.

434. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 434 of the Complaint.

435. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 435 of the Complaint.

436. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 436 of the Complaint.

437. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 437 of the Complaint.

438. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 438 of the Complaint.

439. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 439 of the Complaint.

440. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 440 of the Complaint.

441. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 441 of the Complaint.

442. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 442 of the Complaint.

443. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 443 of the Complaint.

444. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 444 of the Complaint.

445. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 445 of the Complaint.

446. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 446 of the Complaint.

447. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 447 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

448. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 448 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

449. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 449 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

450. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 450 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

451. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 451 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

452. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 452 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

453. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 453 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

454. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 454 of the Complaint.

455. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 455 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

456. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 456 of the Complaint.

457. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 457 of the Complaint.

458. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 458 of the Complaint.

459. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 459 of the Complaint.

460. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 460 of the Complaint.

461. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 461 of the Complaint.

462. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 462 of the Complaint.

463. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 463 of the Complaint.

464. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 464 of the Complaint.

465. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 465 of the Complaint.

466. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 466 of the Complaint.

467. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 467 of the Complaint.

468. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 468 of the Complaint.

469. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 469 of the Complaint.

470. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 470 of the Complaint.

471. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 471 of the Complaint.

472. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 472 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

473. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 473 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

474. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 474 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

475. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 475 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

476. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 476 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations.

477. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 477 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the amount was well above market rates.

478. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 478 of the Complaint, insofar as Relator has not provided any specific identifying information as to the mortgage or property that is the subject of the allegations, except deny that the invoices submitted by the Rosicki Defendants contained unreasonable and unnecessary foreclosure fees.

479. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 479 of the Complaint.

480. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 480 of the Complaint, insofar as Relator has not provided any specific identifying

information as to the mortgage or property that is the subject of the allegations, except deny that the foreclosure fees submitted by the Rosicki Defendants were unreasonable and unallowable.

481. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 481 of the Complaint.

482. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 482 of the Complaint.

483. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 483 of the Complaint.

484. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 484 of the Complaint.

485. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 485 of the Complaint.

486. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 486 of the Complaint.

487. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 487 of the Complaint.

488. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 488 of the Complaint.

489. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 489 of the Complaint.

490. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 490 of the Complaint.

491. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 491 of the Complaint.

492. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 492 of the Complaint.

493. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 493 of the Complaint.

494. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 494 of the Complaint.

495. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 495 of the Complaint, except deny that the Rosicki Defendants engaged in a pattern and practice of impermissible overcharges for foreclosure expenses.

496. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 496 of the Complaint, except deny overcharges by the Rosicki Defendants.

497. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 497 of the Complaint.

498. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 498 of the Complaint.

499. Paragraph 499 states a legal conclusion which does not require a response. Furthermore, Paragraph 499 purports to characterize and describe a statute and/or regulation. That statute and/or regulation, being in writing, is the best record of its contents and Relator's characterization of it is denied.

500. Paragraph 500 states a legal conclusion which does not require a response. Furthermore, Paragraph 500 purports to characterize and describe a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

501. Paragraph 501 states a legal conclusion which does not require a response. Furthermore, Paragraph 501 purports to quote a document. That document, being in writing, is the best record of its contents and Relator's characterization of it is denied.

502. Paragraph 502 states a legal conclusion which does not require a response. Furthermore, Paragraph 502 purports to characterize and describe a statute, regulation and/or government publication. That statute, regulation and/or government publication, being in writing, is the best record of its contents and Relator's characterization of it is denied.

503. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 503 of the Complaint.

504. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 504 of the Complaint.

505. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 505 of the Complaint.

506. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 506 of the Complaint.

507. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 507 of the Complaint.

508. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 508 of the Complaint.

509. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 509 of the Complaint.

510. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 510 of the Complaint.

511. Paragraph 511 purports to characterize and describe communications with unidentified lawyers at Rosicki and partners of other firms. Rosicki Defendants lack knowledge or sufficient information to admit or deny the allegations in Paragraph 511 of the Complaint. To the extent a response is required, Rosicki Defendants deny the allegations in Paragraph 511, specifically that Grubea obtained non-public information about the Rosicki Defendants.

512. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 512 of the Complaint.

513. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 513 of the Complaint.

514. Lack knowledge or sufficient information to admit or deny the allegations in Paragraph 514 of the Complaint.

FIRST CLAIM

Violations of the False Claims Act (31 U.S.C. § 3729(a)(1)(A)) Presentation of False Claims

515. Rosicki Defendants repeat and reallege each and every paragraph stated above as though fully set forth herein.

516. Rosicki Defendants deny the allegations in Paragraph 516 of the Complaint.

517. Rosicki Defendants deny the allegations in Paragraph 517 of the Complaint.

518. Rosicki Defendants deny the allegations in Paragraph 518 of the Complaint.

SECOND CLAIM

**Violations of the False Claims Act
(31 U.S.C. § 3729(a)(1)(B))
Use of False Claims**

519. Rosicki Defendants repeat and reallege each and every paragraph stated above as though fully set forth herein.

520. Rosicki Defendants deny the allegations in Paragraph 520 of the Complaint.

521. Rosicki Defendants deny the allegations in Paragraph 521 of the Complaint.

522. Rosicki Defendants deny the allegations in Paragraph 522 of the Complaint.

THIRD CLAIM

**Violations of the False Claims Act
(31 U.S.C. § 3729(a)(1)(C))
Conspiracy**

523. Rosicki Defendants repeat and reallege each and every paragraph stated above as though fully set forth herein.

524. Rosicki Defendants deny the allegations in Paragraph 524 of the Complaint.

525. Rosicki Defendants deny the allegations in Paragraph 525 of the Complaint.

526. Rosicki Defendants deny the allegations in Paragraph 526 of the Complaint.

527. Rosicki Defendants deny the allegations in Paragraph 527 of the Complaint.

FOURTH CLAIM

**Violations of the False Claims Act
(31 U.S.C. § 3729(a)(1)(G))
Reverse False Claim**

528. Rosicki Defendants repeat and reallege each and every paragraph stated above as though fully set forth herein.

529. Rosicki Defendants deny the allegations in Paragraph 529 of the Complaint.

530. Rosicki Defendants deny the allegations in Paragraph 530 of the Complaint.

PRAYER FOR RELIEF

531. The prayer for relief states only legal conclusions for which no response is required. To the extent any further response is required, Defendants deny that Plaintiff is entitled to any of the relief requested.

AFFIRMATIVE AND OTHER DEFENSES

532. Relator's Complaint fails to state a claim upon which relief can be granted because the Complaint does not allege claims within the meaning of the False Claims Act.

533. Relator's Complaint is barred because the claims asserted are founded upon public disclosure.

534. The Complaint fails to plead claims with the required particularity required under Rule 9(b) of the Federal Rules of Civil Procedure.

535. The Complaint fails to sufficiently allege a false or fraudulent claim submitted to Fannie Mae, Freddie Mac and HUD.

536. The Complaint fails to allege a scheme to defraud that was material.

537. The Complaint fails to allege facts that give rise to the requisite inference of scienter on the part of the Rosicki Defendants.

538. Relator's claims are barred, in whole or in part, because the Rosicki Defendants' conduct was in compliance with, or authorized by, applicable laws and regulations, and contractual requirements.

539. The Government has not incurred a loss as a result of Rosicki Defendants' alleged acts or omissions.

540. The Complaint is barred by laches, waiver, estoppel and other related equitable doctrines.

541. Defendants reserve the right to amend or supplement their answer and defenses; and reserve the right to assert any additional defenses as they are discovered.

Dated: New York, New York
July 23, 2018

McLAUGHLIN & STERN, LLP

By: s/ Daniel J. Horwitz
Daniel J. Horwitz
Tracy A. Burnett
Jonathan R. Jeremias
Attorneys for Rosicki Defendants
260 Madison Avenue
New York, NY 10016
(212) 448-1100
dhorwitz@mclaughlinstern.com
tburnett@mclaughlinstern.com
jjeremias@mclaughlinstern.com